

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

KIM N. DALEY,

Defendant.

Criminal No. 15-MJ-1189-DJC

PETITION FOR WRIT OF HABEAS CORPUS AD PROSEQUENDUM

The United States of America, by and through its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, hereby respectfully requests that this Court issue a Writ of Habeas Corpus Ad Prosequendum to the Suffolk County Correctional Facility, in Boston, Massachusetts, for the purpose of securing the defendant Kim N. Daley for an initial appearance before Magistrate Judge Cabell. In support of this petition, the government states that:

1. Defendant Kim N. Daley is presently confined at Suffolk County Correctional Facility.
2. Defendant Kim N. Daley has been charged by complaint in the above-captioned case.
3. Defendant Kim N. Daley has not yet appeared before the United States District Court, at Boston, Massachusetts, for an initial appearance in the above-captioned criminal action.

WHEREFORE, the government requests that this Court issue a Writ of Habeas Corpus Ad Prosequendum to be directed to the United States Marshal for the District of Massachusetts to the Warden at the Suffolk County Correctional Facility, and to any other person having

custody and control of defendant Kim N. Daley, commanding them to produce Kim N. Daley before Magistrate Judge Donald L. Cabell at the United States Courthouse, 1 Courthouse Way, at Boston, Massachusetts for an initial appearance as so scheduled by this Court. A proposed Writ of Habeas Corpus Ad Prosequendum is filed herewith.

Respectfully submitted,

CARMEN M. ORTIZ,
United States Attorney,

/s/Kenneth G. Shine
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Date: January 4, 2016